

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

TROY LAMONT MOORE, SR.,

FILED

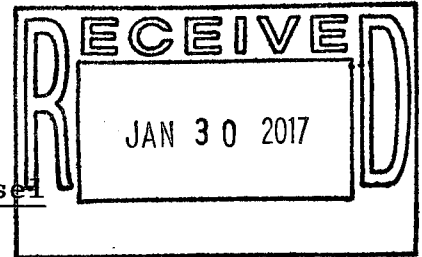
Plaintiff, JAN 30 2017

VS.

CORRECTIONS OFFICER SAAJIDA
WALTON,

Defendant.

Civil Action No. 14-3873
By KATE BARKMAN, Clerk
Dep. Clerk



Motion for the Appointment of Counsel

AND NOW, this 26th day of January, 2017, Plaintiff, Troy Lamont Moore, a Pennsylvania state prisoner, respectfully submits this pro se motion in conjunction to actions following the Honorable Judge Eduardo C. Robreno's 12/19/2016 Order and represents the following:

1. On 12/19/2016, Judge Robreno issued an Order for the Clerk of Court to Amend Civil Action Complaint No. (14-3873) to read "Saaajida Walton" and directed the Clerk to issue a summons to Defendant Walton via the U.S. Marshals to effectuate service of the said complaint.
2. On 01/24/2017, Plaintiff Moore received a USM-285 receipt declaring that Phila. Law Dept. has no identifiable record of Defendant Walton, (despite Defendant Correctional Officer Saaajida Walton being employed at PICC Prison by the City of Philadelphia from 07-07-2008 to 04-05-2014) and in no way has assisted in locating or serving the Defendant.
3. As a PA state prisoner who is currently incarcerated, Plaintiff Moore is of limited means and has extremely limited resources which prevent him from obtaining the services of a private investigator to locate Defendant Walton and/or

PROCESS RECEIPT AND RETURN

See Instructions for "Service of Process by the U.S. Marshal" on the reverse of this form.

U.S. Department of Justice
United States Marshals Service

PLAINTIFF Troy Moore Sr.		COURT CASE NUMBER 14-3873
DEFENDANT SAAJIDA WALTON, Corrections Officer		TYPE OF PROCESS Lawsuit S/C
SERVE	NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN 8301 State Road-Philadelphia, Pa. 19136 Correctional Indust.Center	
	ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code) 8301 State Road-Philadelphia, Pa. 19136	

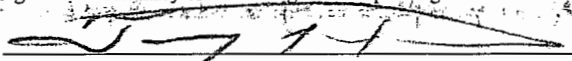
SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW:		Number of process to be served with this Form - 285	1
Troy Moore Fe2483 / CB1002 SCI Forest P.O. Box 945 Marienville, Pa. 16239		Number of parties to be served in this case	1
		Check for service on U.S.A.	xxx

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available For Service):

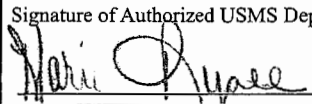
Fold

Fold

I am formally requesting that you serve the defendant (SAAJIDA WALTON) at the above stated last known address or ascertain defendant's forwarding address from the HR dept. at the above mentioned prison (PICC). It is imperative that you serve Judge Robreno and plaintiff a copy of process receipt in a timely manner.

Signature of Attorney or other Originator requesting service on behalf of: 	<input checked="" type="checkbox"/> PLAINTIFF <input type="checkbox"/> DEFENDANT	TELEPHONE NUMBER n/a	DATE 12-21-16
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SPACE BELOW FOR USE OF U.S. MARSHAL ONLY — DO NOT WRITE BELOW THIS LINE

I acknowledge receipt for the total number of process indicated. (Sign only first USM 285 if more than one USM 285 is submitted)	Total Process 1	District of Origin No. 666	District to Serve No. 666	Signature of Authorized USMS Deputy or Clerk 	Date 12-29-16
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I hereby certify and return that I ☐ have personally served, ☐ have legal evidence of service, ☐ have executed as shown in "Remarks", the process described on the individual, company, corporation, etc., at the address shown above or on the individual, company, corporation, etc., shown at the address inserted below.☒ I hereby certify and return that I am unable to locate the individual, company, corporation, etc., named above (See remarks below)

Name and title of individual served (if not shown above)	<input type="checkbox"/> A person of suitable age and discretion then residing in the defendant's usual place of abode.
Address (complete only if different than shown above)	Date of Service Time am pm
	Signature of U.S. Marshal or Deputy

Service Fee	Total Mileage Charges (including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount owed to U.S. Marshal or	Amount of Refund
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REMARKS:

① Phila Law Dept. has no identifiable record of Individual. CANNOT ACCEPT. We do not ascertain legal info from HR in these instances. B. Deposa 1/18/17

NOTE



PENNSYLVANIA INSTITUTIONAL LAW PROJECT

Angus R. Love, Esq., Executive Director

May 12, 2014

Troy Moore
FE-2483
SCI Forest
PO Box 945
Marienville, PA 16239-0945

Dear Mr. Moore:

I am in receipt of your letter(s). Due to an overwhelming caseload, the Pennsylvania Institutional Law Project is unable to provide direct representation to you. Our office receives thousands of requests per year, but is only able to handle a small amount due to our limited budget and staff. You may sue on your own by filing a 1983 form. Remember that you must exhaust all administrative remedies before filing a lawsuit. For incidents that occurred in Pennsylvania, the statute of limitations for filing a lawsuit is two years from the date of the incident. If you do sue and your case survives the Motion for Summary Judgment, feel free to get back to us and we will reevaluate your case.

Our office is available to assist you with advice or materials, if you decide to file a pro se lawsuit. I am sorry that we could not be more helpful and I wish you the best of luck.

Sincerely,

Michael Bailey
Legal Assistant

PEOPLES LAW OFFICE

1180 N. Milwaukee
Chicago, Illinois, 60642
(773) 235-0070
Fax (773) 235-6699
PeoplesLaw@aol.com

Michael E. Deutsch
Berl H. Elson
Sarah Gelsomino
Janine L. Hoft
Joey L. Mogul
John L. Stainthorpe
Jan Susler
G. Flint Taylor, Jr.

Of Counsel
Jeffrey H. Haas

May 26th, 2015

Dear Mr. Moore,

Please forgive us for the delay in responding to your letter. Unfortunately we are a small law office with limited resources. While we believe that you may have legitimate issues to litigate in court we sincerely regret that the People's Law Office is not in a position to assist you with that legal struggle.

Sincerely,

People's Law Office



Organized In 1973

LEWISBURG PRISON PROJECT

P.O. Box 128
Lewisburg PA 17837
www.lewisburgprisonproject.org

Ph: 570.523.1104 Fax: 570.523.3944
Email: prisonproject@windstream.net

January 28, 2016

Troy L. Moore, Sr. FE-2483
SCI Forest
P.O. Box 945
Marienville PA 16239

Dear Mr. Moore:

We received your undated letter today and want to inform you that the Lewisburg Prison Project deals primarily with conditions of confinement in the Middle District of PA. Since you are at SCI Forest, we suggest that you may want to write to the Pennsylvania Institutional Law Project ("PILP") located in Pittsburgh. That office deals with conditions of confinement (not criminal matters) in the Western District of Pennsylvania, which includes SCI Forest. They also have an attorney on staff (which LPP does not) and they can be reached at:

Alexandra Morgan-Kurtz, Esq.
Pennsylvania Institutional Law Project
429 Forbes Ave. Suite 800
Pittsburgh PA 15219

We wish you the best.

Sincerely,

Elayne Sobel, Legal Assistant
Lewisburg Prison Project



BERGER AND GREEN

Attorneys at Law

February 22, 2016

Cynthia C. Berger
Laurence B. Green
William J. Remaley
Mark F. Bennett
Mark E. Milsop
Linell Lee
Amanda J. Bonnesen
C. William Kenny
Isabel K. Lee
Of Counsel
Michael W. Zimecki
Of Counsel

Troy Moore
DC# FE2483
Housing Unit AB 2034
SCI Forest
P.O. Box 945
Marienville, PA 16239

In Re: Recent Inquiry

Dear Mr. Moore:

I am in receipt of your correspondence postmarked February 19, 2016, in which you request representation.

Unfortunately, we will not be able to provide representation to you. You may want to contact the Pennsylvania Lawyer Referral Service at (800) 692-7375.

I wish you the best in pursuing these matters.

Sincerely,



Laurence B. Green

LBG/cno
Enclosure



PENNSYLVANIA INSTITUTIONAL LAW PROJECT
Angus R. Love, Esq., Executive Director

November 21, 2016

Troy Moore
FE-2483
SCI Forest
PO Box 945
Marienville, PA 16239

Dear Mr. Moore:

I am in receipt of your recent letter concerning the fact that your lawsuit may be dismissed because you do not have the first name of the Defendant Walton. I did attempt to find his first name by searching PACER (the federal court data base), Google and Facebook but was unsuccessful and unfortunately, our office is not able to provide you with direct representation in this matter.

You should attempt to conduct another round of discovery and request the first name of Correctional Officer S. Walton. They (the City and its Law Dept.) do have his name but will probably try to resist providing it to you. One issue that you may run into is the fact that there are no other defendants to whom you can direct your discovery request. Enclosed are some materials that may assist you framing your request.

I am sorry that we could not be more helpful and I wish you the best of luck.

Sincerely,

Michael Bailey
Legal Assistant

Encl: GPQ

PILP has a grievance procedure for denials of service. The procedure will be mailed to you within ten days of our receipt of your written request for the procedure.